

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	
	:	CASE NO. 1-10-05235
RESIDENCE FOR RENAL CARE	:	CHAPTER 11
AT SHADYSIDE, LTD.	:	
Debtor	:	

**APPLICATION FOR ORDER  
UNDER FED. R. BANKR. P. 1015  
FOR JOINT ADMINISTRATION OF CASES**

Residence for Renal Care at Shadyside, Ltd. (“Residence”) and Center for Renal Care at Shadyside, Ltd. (“Center”), Debtors and Debtors-In-Possession in the above captioned cases (collectively the “Debtors”), hereby apply for an order under Fed. R. Bankr. P. 1015 allowing for and authorizing the joint administration of the Debtors’ Chapter 11 cases for procedural purposes only as follows:

1. On June 24, 2010 (the “Petition Date”), the Debtors each filed voluntary petitions in this Honorable Court under Chapter 11 of the United States Bankruptcy Code (as amended, the “Code”). The Debtors manage their respective assets and properties and operate their businesses as Debtors-In-Possession.

2. No Creditors’ Committee has yet been appointed in either of these cases by the United States Trustee.

3. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. Venue herein is proper pursuant to 28 U.S.C. §§ 1408 and 1409. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

4. The predicate for the relief requested herein is Rule 1015 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”).

5. Residence is a Corporation organized and existing under the laws of Commonwealth of Pennsylvania. Residence owns a Nursing Home Facility (the “Facility”) in Pittsburgh, Pennsylvania.

6. Center is a Corporation organized and existing under the laws of Commonwealth of Pennsylvania. Residence operates a dialysis center (the “Dialysis Center”) in Pittsburgh, Pennsylvania, at the same location of the Residence’s Facility.

7. Residence and the Facility have a commonality of ownership.

8. Further, various creditors are either joint as to secured creditors, or have some commonality in both cases. It is believed that there is cross collateralization between the assets of Residence and the assets of the Center with respect to the secured creditors of the Debtor.

9. Bankruptcy Rule 1015(b) provides for joint administration of estates where two or more petitions are pending by or against the Debtor or its affiliate. Because of the commonality

in ownership of the Debtors, it is believed that the Debtors are affiliates as such is defined in the Bankruptcy Code. Accordingly, joint administration of the Debtors' estates is appropriate.

10. The joint administration of these affiliated Debtors' Chapter 11 cases will permit the Clerk of the Court to utilize a single general docket for these cases and reduce the volume of paper that would otherwise be filed with the Clerk's Office and simplify administration of the cases. It is believed that no parties in interest or creditors will be prejudiced. This is not a motion for substantive consolidation. Further, the granting of joint administration will relieve the Court of the burden of entering duplicative orders and keeping duplicative files.

11. The Debtors request that the official caption to be used by all parties in all pleadings in the jointly administered cases be as follows:

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IN RE:	:
	: CHAPTER 11
RESIDENCE FOR RENAL CARE	:
AT SHADYSIDE, LTD.,	: CASE NO. 1-10-05235
Debtor	: CASE NO. 1-10-05238
	: (Jointly Administered)

12. The Debtors request that a docket entry reflecting the joint administration, in the form that is contained in the order accompanying this Application, be made in each of the Debtors' cases.

WHEREFORE, it is respectfully requested by the above Debtors that the Court enter an order providing for the joint administration of these cases pursuant to Fed. R. Bankr. P. 1015 and granting the Debtors such other and further relief as is just and proper.

Respectfully submitted,

CUNNINGHAM & CHERNICOFF, P.C.

By: /s/ Robert E. Chernicoff

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Date: June 24, 2010

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